

February 17, 2005

Andrew Fisk, Director  
Bureau of Land and Water Quality  
Maine Department of Environmental Protection  
17 State House Station  
Augusta, ME 04333-0017

Dear Mr. Fisk:

I am writing this letter to provide comments on the draft Androscoggin River Total Maximum Daily Load dated December 2004. As a citizen of Byron, Maine, a County Commissioner for Oxford County, Maine and a member of the Community Advisory Panel, I have a strong interest in environmental issues and the protection of the environment of the Rumford, Mexico, Dixfield, Peru and surrounding region. I appreciate the opportunities provided by DEP for written public comment as well as the public meeting that was held in Rumford which I attended. It was apparent by the large turnout at this public meeting that the local citizens, Legislators and public officials have concerns with this regulatory process and our concerns need to be addressed.

I believe that it is important for this TMDL to be protective of water quality in the Androscoggin River while preserving the viability of the municipalities that depend on the river. DEP can work toward this balance by allowing the affected communities and facilities appropriate time and flexibility to implement this TMDL. This phased implementation will ultimately allow all the regulated sources to make smarter, better decisions while still achieving everyone's goal of improving water quality.

I am also concerned that all issues on the Androscoggin River be dealt with in a fair and consistent manner. It is my understanding that there are sections of the river below Lewiston/Auburn that do not meet State water quality standards, but are not being regulated as part of this TMDL. If our goal is a clean river, our communities should not be held to a different standard than other communities on the same river.

It seems apparent that the presence of the Gulf Island dam is a major contributor to water quality issues on the Androscoggin River, yet the draft TMDL does not clearly identify what role the dam owners have in correcting these problems. Since the report clearly details what the mills and municipal treatment plants must do, it seems that the report is incomplete without identifying what the owners of the dam must do as well.

Thank you for giving these comments your careful consideration.

Sincerely,  
Dave Duguay  
Oxford County Commissioner